## IV. REMARKS

Claims 1-2, 4-12, 14, 16-23 and 25-31 are pending in this application. By this

Amendment, claims 1, 11, 18, and 26 have been amended and the previous amendment to the specification (not entered) has been cancelled. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the above amendments and the following remarks is respectfully requested.

Entry of this Amendment is proper under 37 C.F.R. §1.116(b) because the Amendment:

(a) places the application in condition for allowance as discussed below; (b) does not raise any new issues requiring further search and/or consideration; and (c) places the application in better form for appeal. Accordingly, Applicants respectfully request entry of this Amendment.

In the Office Action, claims 1-2, 4-10, 18-23 and 25-31 are rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Hamlin (USPN 6,310,888 B1); claims 11, 14 and 16-17 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Hamlin in view of "EDI - the grand daddy of electronic commerce", BT Techhnol. J., Vol. 17, No. 3, July 1999, PP. 17-23, hereinafter "EDI". Applicants respectfully submit that the current invention is patentable for the reasons stated below.

With respect to independent claims 1, 18 and 26, Hamlin does not disclose each and every claimed feature. The claimed invention includes, *inter alia*, "translating a data format and an application format of the transaction element[,]" as recited in claims 1, 18 and 26. A data

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format refers to, *inter alia*, an organization and contents of various pieces of information of a transaction element, for example, "Chevrolet, Blazer, 1999" vs. "Blazer, Chevy, 99." An application format refers to, *inter alia*, a format of transaction element data under a specific software application. In sharp contrast, Hamlin does not disclose, *inter alia*, translation of a data format. Hamlin discloses a "conversion function" that "converts the data from a source (application process) format to a standard format, and then converts the data from the standard format to a destination (application process) format." (Col. 4, lines 6-9). (Parenthetical explanations added). That is, Hamlin only discloses an application format conversion, not a data format translation. The following example illustrates the distinction between an application format conversion (of Hamlin) and a data format translation (of the claimed invention).

Transaction element "Chevrolet, Blazer, 1999" in a Microsoft Word Mord format may be converted to "Chevrolet, Blazer, 1999" in a Corel WordPerfect format using the application format conversion of Hamlin, but will not be converted to "Blazer, Chevy, 99" because the organization of the various pieces of information, i.e., Blazer, Chevrolet, and 1999, can not be converted by the application format conversion. In addition, the application format conversion of Hamlin can not translate "Chevrolet" to "Chevy". In contrast, the data format translation of the claimed invention can translate "Chevrolet, Blazer, 1999" into "Blazer, Chevy, 99."

In addition, Hamlin does not disclose, *inter alia*, "routing the transaction element from the first trading partner in a first communication protocol to the second trading partner in a second different communication protocol of the second trading partner[,]" as the claimed invention does. (Claims 1, 18 and 26 of the current invention). This claimed feature of the current invention solves the problem that due to the quantity of various combinations of

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communication protocols, adapting to or adopting every schema and protocol is both expensive and time consuming. Hamlin discloses nothing regarding the problem of different communication protocols. Actually, by disclosing "one or more processing systems connected to a communication network" (col. 3, lines 60-61), Hamlin assumes that all the processing systems share a single communication protocol.

In the Office Action, the Office indicates that the prior version of claims does not clearly claim this feature. (Office Action at pages 7-8). By this Amendment, claims 1, 11, 18 and 26 have been amended to further clarify the distinction between the claimed invention and Hamlin.

In view of the foregoing, Hamlin does not anticipate the current invention. Accordingly, Applicants respectfully request withdrawal of the rejections.

With respect to independent claim 11, the above arguments also apply. EDI does not overcome the deficiencies of Hamlin because EDI is provided only to overcome Hamlin's failure to disclose a method for exchanging automotive information, not to overcome the deficiencies of Hamlin as stated above regarding claims 1, 18 and 26. (See Office Action at pages 6-7.)

Moreover, EDI does not overcome the deficiencies of Hamlin regarding exchanging automotive information because EDI only deals with rigorously structured information in an "agreed standard format." (EDI at page 17). (Emphasis added). By sharp contrast, the claimed invention includes exchanging automotive information in different data formats and application formats, and in different communication protocols, which are missing in EDI.

In view of the foregoing, the current invention is patentable, and Applicants respectfully requests withdrawal of the rejections

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The dependent claims are believed allowable for the same reasons as stated above, as well as for their own additional features.

## $\mathbf{v}$ . CONCLUSION

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

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